

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the
Commonwealth, HTA, and ERS.**

**CERTIFICATE OF NO OBJECTION AND REQUEST FOR ENTRY, WITHOUT A
HEARING, OF ORDER GRANTING FORTY-SEVENTH OMNIBUS OBJECTION
(NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, PUERTO
RICO HIGHWAYS AND TRANSPORTATION AUTHORITY, EMPLOYEES
RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO TO EXACT DUPLICATE CLAIMS (ECF NO. 7274)**

On June 6, 2019, the Commonwealth of Puerto Rico (the “Commonwealth”), Puerto Rico Highways and Transportation Authority (“HTA”), and Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth and HTA, the “Debtors”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the representative of the Debtors, pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),²

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² PROMESA has been codified at 48 U.S.C. §§ 2101–2241.

filed, among others, the *Forty-Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Exact Duplicate Claims* [ECF No. 7274] (the “Forty-Seventh Omnibus Objection”).

Responses, if any, to the Forty-Seventh Omnibus Objection were to be filed and served no later than July 9, 2019 at 4:00 p.m. (Atlantic Time) (the “Objection Deadline”). While no responses to the Forty-Seventh Omnibus Objection were filed, at least one claimant elected to voluntarily withdraw its claim after the Forty-Seventh Omnibus Objection was filed. *See Stipulation and Agreed Order Regarding Withdrawal of Proof of Claim of U.S. Bank National Association (Claim No. 32565)* [ECF No. 7873]. Additionally, the advisors for the Oversight Board conducted a secondary review of the claims subject to the Forty-Seventh Omnibus Objection, and, as a result of this review, the Debtors voluntarily withdrew objections to certain claims subject to the Forty-Seventh Omnibus Objection. *See Notice of Withdrawal of Objection as to Claim and of Submission of Amended Exhibit to Claim Objection* [ECF No. 7873]. These efforts culminated in the filing, on July 17, 2019, of an amended proposed order and schedule of claims subject to the Forty-Seventh Omnibus Objection. *See Attachment 7 to Notice of (A) Withdrawal of Objections to Certain Claims and (B) Submission of Amended Exhibits to Claim Objections* [ECF No. 8084-7].

According to this Court’s *Tenth Amended Case Management Procedures* [Case No. 17-03283-LTS, ECF No. 8027-1] (the “Case Management Procedures”) and *Order Further Amending Case Management Procedures* [ECF No. 8027], the Court may enter an order granting a request for relief without a hearing upon receipt of a certificate of no objection (“CNO”, as defined by the Case Management Procedures). *See Case Management Procedures*, Section III, paragraph P.

In accordance with the Case Management Procedures, the undersigned hereby certifies that this CNO is filed not less than forty-eight (48) hours after the expiration of the Objection Deadline. The undersigned further certifies that counsel for the Oversight Board has reviewed the Court's docket in the above-captioned case not less than forty-eight (48) hours after expiration of the Objection Deadline, and, to the best of counsel's knowledge, no applicable objection, responsive pleading, or request for a hearing with respect to the Forty-Seventh Omnibus Objection appears on the docket.

WHEREFORE the Debtors respectfully request that the Court enter the proposed order attached hereto as **Attachment 1**, which is identical to the amended proposed order and schedule of claims subject to the Forty-Seventh Omnibus Objection filed July 17, 2019.

Dated: July 23, 2019
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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